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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. McAVOY, CLERK DEPUTY
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6 IN THE UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON
8
9 UNITED STATES OF AMERICA,

1:16-CR-2079-SAB
INDICTMENT

10 Plaintiff,

11 vs.

12 DANIEL WOOLEM,
13 JOSE GARZA,
14 MIGUEL ANGEL MARTINEZ;
15 TINA REEDY, and
16 DWIGHT EMERY REEDY.

17 Defendants.

Ct. 1: 21 U.S.C. § 846 - Conspiracy to
Distribute Methamphetamine

Ct. 2: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

Ct. 3: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

Ct. 4: 18 U.S.C. § 841(a)(1) – Distribution
of Heroin

Ct. 5: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

Ct. 6: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

Ct. 7: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

Ct. 8: 21 U.S.C. § 841(a)(1) – Distribution
of Methamphetamine

25 Notice of Criminal Forfeiture

26 The Grand Jury charges:

27
28 INDICTMENT

COUNT 1

From on or about January 27, 2016, and continuing to on or about October 6, 2016, in the Eastern District of Washington, the Defendants, DANIEL WOOLEM, JOSE GARZA, MIGUEL ANGEL MARTINEZ, DWIGHT EMERY REEDY, and others known and unknown to the Grand Jury, knowingly and intentionally combined, conspired, confederated and agreed together and with others, to commit the following offense against the United States, to wit: to knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B)(viii), and 846.

COUNT 2

On or about January 27, 2016, in the Eastern District of Washington, the Defendant, DANIEL WOOLEM, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 3

On or about March 23, 2016, in the Eastern District of Washington, the Defendant, JOSE GARZA, did knowingly and intentionally distribute 5 grams or more of actual methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).

COUNT 4

On or about April 19, 2016, in the Eastern District of Washington, the Defendants, DWIGHT EMERY REEDY and TINA REEDY, did knowingly and intentionally distribute a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C), and 2.

COUNT 5

On or about April 27, 2016, in the Eastern District of Washington, the Defendants, JOSE GARZA and DANIEL WOOLEM, did knowingly and intentionally distribute 50 grams or more of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, all in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B)(viii), and 2.

COUNT 6

On or about May 10, 2016, in the Eastern District of Washington, the Defendants, DWIGHT EMERY REEDY and DANIEL WOOLEM, did knowingly

1 and intentionally distribute 50 grams or more of a mixture and substance
2 containing a detectable amount of methamphetamine, a Schedule II controlled
3 substance, all in violation of Title 21, United States Code, Section 841(a)(1),
4 (b)(1)(B)(viii), and 2.
5

6 COUNT 7

7 On or about June 2, 2016, in the Eastern District of Washington, the
8 Defendants, DANIEL WOOLEM, JOSE GARZA, and MIGUEL ANGEL
9 MARTINEZ, did knowingly and intentionally distribute 50 grams or more of a
10 mixture and substance containing a detectable amount of methamphetamine, a
11 Schedule II controlled substance, all in violation of Title 21, United States Code,
12 Section 841(a)(1), (b)(1)(B)(viii), and 2.
13
14

15 COUNT 8

16 On or about October 6, 2016, in the Eastern District of Washington, the
17 Defendant, DANIEL WOOLEM, did knowingly and intentionally distribute 5
18 grams or more of actual methamphetamine, a Schedule II controlled substance, all
19 in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(viii).
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21

22 **NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

23
24 1. The allegations contained in this Indictment are hereby realleged and
25 incorporated by reference for the purpose of alleging forfeitures pursuant to 21
26 U.S.C. § 853.
27
28

2. Pursuant to 21 U.S.C. § 853, upon conviction of an offense in violation of 21 U.S.C. §§ 841, 846 as set forth in this Indictment, Defendants, DANIEL WOOLEM, JOSE GARZA, MIGUEL ANGEL MARTINEZ, TINA REEDY, and DWIGHT EMERY REEDY shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s) and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense(s).

3. If any of the property described above, as a result of any act or omission of the Defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c).

DATED: October 12, 2016.

A TRUE BILL.

Presiding Juror

MICHAEL C. ORMSBY
United States Attorney

Thomas J. Hanlon
Assistant United States Attorney